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"I will stand for my client's rights.
I am a trial lawyer."
-Ron Motley (1944-2013)

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December 30, 2014

VIA ECF

Hon. Brian M. Cogan
United States District Judge
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Linde v. Arab Bank, PLC*, No. CV 04-2799 (BMC)(VVP) and related cases

Dear Judge Cogan:

We write today on behalf of the *Almog* and *Afriat-Kurtzer* Plaintiffs' counsel to inform the Court of a recent change in circumstances. Plaintiffs' counsel have been recently retained by a finite number of American-citizen victims of terrorist attacks carried out by Hamas and various other terrorist groups that took place between November 4, 2001 and January 29, 2004.¹ The most pertinent for the Court's present purposes are the claims for Mr. Asael Anicca a/k/a Asael Meir Friedmann who was injured both physically and emotionally in the bombing at Café Moment in Jerusalem on March 9, 2002.

Because the scheduled May 18, 2015 damages trial includes Café Moment damages claims, and given the pre-trial discovery schedule, we felt it appropriate to immediately notify the Court of the existence of these additional prospective plaintiffs. Although we do not believe the addition of these parties will impact the current schedule, we will promptly contact defense counsel to ascertain whether they will consent to their addition as plaintiffs in these cases. We will then promptly advise the Court whether, pursuant to Fed. R. Civ. P. 15(a)(2) and 21, and

¹ We have been retained on behalf of one personal injury claimant for the March 9, 2002 Café Moment suicide bombing; one personal injury claimant and his mother for the December 1, 2001 Ben Yehuda dual suicide bombing; the mother of a severely-wounded teenager from a June 11, 2002 roadside bombing in Sede Kalev near Hebron; an individual who witnessed an ambush on his spouse's vehicle in which his wife and three daughters were riding near Beit Haggai on September 26, 2002; five personal injury claimants and their family members from a November 4, 2001 shooting attack on Bus No. 25 in the French Hill subdivision of Jerusalem; the wife of one of the current plaintiffs from the December 12, 2001 attack on Bus No. 189 near Emmanuel; three victims of a June 19, 2002 suicide bombing in French Hill; the sister of a decedent from the January 29, 2004 Bus No. 19 suicide bombing in Jerusalem; the wife of a personal injury victim of a November 28, 2002 shooting attack in Beit Shean; and a personal injury claimant from an October 27, 2002 suicide bombing at a gas station in Ariel.

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subject to the Court's approval, we believe it is appropriate and efficient to adjudicate Mr. Anicca's claims as part of the May trial.²

Respectfully submitted,



John M. Eubanks

² We do not anticipate a large addition of potential witnesses relating to Mr. Anicca's claim other than Mr. Anicca himself and his former treating psychiatrist Vivienne M. Damelin.